

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 236 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF

58S-11

JUN 0 5 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

STEFFEN WILLIAM & SON IMPLEMENTATION SHOP 657 N. MAIN BLUFFTON, IN 46714

Re: Wayne Reclamation and Recycling ("Site")
Columbia City, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site. A Remedial Investigation/Feasibility Study (RI/FS) of the Site has been completed. This action was undertaken pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Section 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499 (CERCIA).

In accordance with the requirements of Section 104(b) of CERCIA, the Remedial Investigation (RI) Report describes findings on the nature and extent of contamination at the Site. The Feasibility Study (FS) Report considered alternatives necessary to address the conditions at the Site. Along with the FS Report, U.S. EPA issued a Proposed Plan for a thirty day public comment period which ended February 21, 1990. On March 30, 1990, the Regional Administrator issued a Record of Decision (ROD) selecting the remedial action which was originally proposed (See Attachment III) for the Site.

Unless the U.S. EPA determines that a potentially responsible party (PRP) will voluntarily undertake the remedial action necessary at the Site, U.S. EPA may, under Section 104 of CERCIA, undertake the remedial action itself and, under Section 107 of CERCIA, seek reimbursement from PRPs of all response costs incurred in connection with the action taken. Such costs may include, but are not limited to, expenditures for investigation, planning, response and enforcement activities.

Moreover, under Section 106 of CERCIA, U.S. EPA may order responsible parties to implement relief actions deemed necessary by U.S. EPA to protect the public health, welfare or environment from an imminent and substantial

endangerment because of an actual or threatened release of a hazardous substance from a facility.

Responsible parties under Section 107 of CERCIA include current owners and operators of the Site, former owners and operators of the Site at the time of disposal of hazardous substances, as well as persons who owned or possessed hazardous substances and arranged for disposal, treatment, or transportation of such hazardous substances, and persons who accepted hazardous substances for transportation for disposal or treatment to a facility selected by such transporter. U.S. EPA has information indicating that you are a PRP with respect to the Wayne Reclamation and Recycling site. The sources of this information are briefly summarized in Paragraph A of Attachment I to this letter. By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a potentially responsible party, to reimburse U.S. EPA for the costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

In accordance with CERCIA and other authorities, U.S. EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Site. These response actions are summarized in Paragraph B of Attachment I to this letter. The approximate cost to date of the response actions performed through U.S. EPA funding at the Site is set forth in Paragraph C of Attachment I. The Agency anticipates expending additional funds for response activities at the Site under the authority of CERCIA and other laws. In accordance with Section 107(a) of CERCIA, demand is hereby made for payment of the amount specified in Paragraph C of Attachment I plus any and all interest authorized to be recovered under Section 107(a) or under any other provision of law. Demand is also hereby made under these authorities for payment of interest on all future costs that U.S. EPA may incur in regard to the Site.

U.S. EPA is currently planning to conduct the following additional response activities at the Site:

- Design and implementation of the remedial action selected and approved by U.S. EPA for the Site; and
- Provision of any monitoring, operation and maintenance necessary at the Site after the remedial action is completed.

In addition, U.S. EPA may, pursuant to its authorities under CERCIA and other laws, decide that other clean-up activities are necessary to protect public health, welfare and the environment.

If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to inform U.S.

EPA of the status of those discussions or actions in a response to this letter and to provide a copy of this response to any other parties involved in those discussions or actions. Your response letter should be sent to:

Tinka G. Hyde, 5HS-11 U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

Pursuant to Section 122(e)(1) of CERCIA, the U.S. EPA has determined that a period of negotiation may facilitate an agreement with you and other PRPs. Upon initiation of the negotiations moratorium period, you will have a maximum of 60 days to coordinate with any PRPs and to present to U.S. EPA a "good faith" proposal for implementing and conducting the remedial action recommended in the Proposed Plan. To assist the PRPs in negotiating with U.S. EPA concerning this matter, U.S. EPA is providing a list of all other PRPs to whom this notification is being sent and the names and addresses of the RI/FS PRP Steering Committee. This list is appended as Attachment II to this letter. It should be noted that inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for remediation of Site conditions or payment of past costs. Information regarding a ranking by volume and nature of substances contributed by each PRP, as contemplated by Section 122(e)(4)(A), has previously been provided to the steering committee.

In accordance with the requirements of Section 122(e)(2), during the 60 day calendar period, beginning June 28, 1990, the U.S. EPA will not commence remedial action at the Site. U.S. EPA may, however, commence any additional studies or investigations authorized under Section 104(b), including remedial design, during this negotiation period. If U.S. EPA receives from the PRPs within the 60 day calendar period a written "good faith offer" which demonstrates the PRP's qualifications and willingness to conduct and/or finance the remedial design and remedial action (RD/RA) consistent with U.S. EPA's Proposed Plan, U.S. EPA will extend its moratorium on commencement of the remedial action work an additional 60 calendar days. The Proposed Plan, which recommended the remedy that was chosen by the Regional Administrator in the ROD, is appended as Attachment III.

The purpose of the additional time is to allow the PRPs and the U.S. EPA a period of time to finalize the settlement. A "good faith offer" for RD/RA should include the following:

- a statement of the PRPs' willingness to conduct and/or finance the RD/RA which is generally consistent with U.S. EPA's Proposed Plan or which provides a sufficient basis for further negotiations in light of U.S. EPA's Proposed Plan;
- o a detailed "statement of work" or "workplan" identifying how PRPs plan to proceed with the work;

- a demonstration of the PRPs' technical capability to undertake the RD/RA. This should include a requirement that PRPs identify the firm they expect will conduct the work or that PRPs identify the process they will undertake to select a firm.;
- o a demonstration of the PRPs' capability to finance the RD/RA;
- o a statement of the PRPs' willingness to reimburse U.S. EPA for past response and oversight costs; and
- the name, address, and phone number of the party or steering committee who will represent the PRPs in negotiations.

Except in extraordinary circumstances explained in a written request, no extension to this 60 day period will be granted by the U.S. EPA. If a "good faith" proposal is not received within 60 calendar days, the U.S. EPA, pursuant to section 122(e)(4), may proceed to undertake such further action as is authorized by law, including implementation of the remedial action utilizing public funds available to the Agency.

To further facilitate your and any other PRPs' ability to present a "good faith" proposal within the 60 day time limit, the Agency has set up a meeting to provide information that will assist the PRPs in that effort. Toward that end, a draft Consent Decree and Statement of Work (SOW) will be provided to those persons attending this meeting. The details for the meeting are as follows:

Thursday, June 28, 1990 10:30 a.m. Fort Wayne, Indiana Holiday Irn, Grand Ballroom 300 E. Washington Blvd. (219) 422-5511

Additionally, the draft Consent Decree was provided to the State of Indiana. These revisions will be forwarded to the PRPs as they become available. Please note that the draft consent decree and scope of work, though already partly tailored for the purpose of exploring settlement possibilities with you at this particular site, are subject to changes based on the current, ongoing review of these documents by the Department of Justice.

An Administrative Record containing documents that form the basis for the Agency's decision on the selection of the remedy is available for public inspection at U.S. EPA - Region V office in Chicago, Illinois or at the information repositories located at the Columbia City Hall and Peabody Library in Columbia City, Indiana.

If you need further information regarding this letter, you may contact

Tinka Hyde of the Remedial and Enforcement Response Branch at (312) 886-9296. If you have an attorney handling your legal matters, please direct his or her questions to Elizabeth Doyle of the Office of Regional Counsel, U.S. EPA, Region V, at (312) 886-7951.

By a copy of this letter, the U.S. EPA is notifying the State of Indiana and the Natural Resources Trustees, in accordance with Section 122(j) of CERCIA, of its intent to enter into negotiations concerning the implementation of remedial action at the Site, and is also encouraging them to consider participation in such negotiations.

If you have not already done so, the U.S. EPA strongly encourages you to take immediate steps to organize into a Committee to negotiate an agreement with U.S. EPA to undertake the remedial actions at the Site. We hope that you will give this matter your immediate attention.

Sincerely yours,

John Kelley, Acting Chief

Remedial and Enforcement Response Branch

Enclosures

c: Sheila Huff, DOI

Doug Fisher, IDEM Tom Mariani, DOJ

Patrick Ralsdon, IDNR

Environmental Defense Section, DOJ

Indiana Attorney General

Dan Sparks, USFW

ATTACHMENT I

- A. U.S. EPA has evaluated a body of evidence in connection with its investigation of the Site, specifically, State of Indiana, SPC-17 Liquid Waste Removal Record Hauler Reports pertaining to the Site. Based on this evidence, U.S. EPA has information indicating that you are a potentially responsible party with respect to this Site.
- B. The current PRP Group has conducted the following studies and/or activities at the Site.
 - 1. 1986 Removal Action removed and disposed of contaminated soil, disposal of contents of 215-55 gallon drums and backfill of excavated areas.
 - 2. Remedial Investigation to determine the nature and extent of contamination at the Site.
 - 1988 Removal Action conducted by a group of 5 PRPs, removed and disposed of additional contaminated soil and drums, disposal of 23 horizontal tank contents, and fencing.
 - Feasibility Study to evaluate the feasibility of possible alternatives to remediate the Site contamination identified during the Remedial Investigation.
 - 5. U.S. EPA released it's Proposed Plan for the site remediation on January 22, 1990.
 - 6. U.S. EPA issued it's Record of Decision for the WRR site remediation on March 30, 1990.
- C. Past Costs: As of October 17, 1989, \$622,066.58 have been expended by U.S. EPA at this Site. The PRPs have been billed for oversight costs and to date have paid \$56,588.02 towards their bills. Therefore, past costs incurred by the U.S. EPA as of October 17, 1989 are \$565,478.56. Following that date, U.S. EPA has incurred, and will incur, additional response costs regarding the WRR site.

ATTACHMENT II

The names and addresses of all parties receiving a copy of this letter are attached.

CURRENT WRR PRP GROUP STEERING COMMITTEE

William N. Hall Breed, Abbott & Morgan 1875 Eye Street, N.W. Washington, D.C. 20006 (202)466-1118

Christopher J. Dunsky Honigman Miller Schwartz and Cohn 2290 First National Building Detroit, Michigan 48226 (313) 256-7872

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30 900116 HOTE CONSTRUCTION P.O. BOX 229 UNION CITY, IN_47390

33 900116 HIPSCO 114 E. WAYNE STREET PORT NATHE, IS_46802

36 900116 WORRIS TRUCKING P.O. BOX 31 W.S. 20 0257 LAGRANGE, EM_86761

39 900116 OTHY, IRC. 486 W. COUNTY ROAD 300 MORTH WARSAW, IW_46500

42 900116 REITH REILLY P.O. BOX 1108 ELKMART, IN_46515

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2421 W. WALLEN ROAD
PORT WATHE, IN 46818

32 900116 NIPSCO 420 BROADWAY CHESTERTON, IN_46304

35 900116 MIPSCO 101 S. MICHIGAN STREET PLYNOUTH, IM_46563

36 900116 O'BRIEN CORP-P.O. BOX 17 SOUTH BEND, IN_46628

900116 REJ HANDPACTURING 1420 STANLEY DRIVE PLYNUTH, IN 46563

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25099 W.S. RIGHWAY 33 W
ELKHART, IU_46516

57 900116 A. MATTERSLET & SON P.O. BOX 5366 3939 HOBILE AVENUE PORT WATHE, IN_86895

60 900116 ALBCTRICO, INC. 55000 CORRANT ROAD P.O. DOE 690 HISHAWAKA, IW_46544

63 900116 AMOCO OIL COMPANT 200 E. RAWDOLOW DRIVE CHICAGO, IL_60601

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HARTEL BUNDELLS HOTER
SR. APTOROST, AND PIPELINE CO.
500 REMAINSANCE CENTER
C/O ONE UCCOLOR AVE.
DETROIT, HI_UE263

69 900116 ASHLEY HARD; INC. 56003 BLEMARY COURT ELKHARY, IM_46516

72 900116
BASTIAN PLATING CO., INC.
625 W. 15TH STREET
AUBURN, IN 46706-2133

TRUMBALL & SONS P.O. BOX 87 LARVILL, IN_46764

52 900116 UNITED POOL P.O. BOX 1352 ELENARY, IN_46575

55 900116 WEIL-MCLAIN DIVISION OF MARLEY (**O. BLAINE STREET MICHIGAN CITY, IN_46,360

50 900116 ACTIVE PRODUCTS CORP-BERGERT A. SPITZER, JR. ATTORRET AT LAW P.O. BOE 927 BARTON, IN_96052

61 900116 GART CROUTE ALUMENOM COMPANY OF ARERICA 1501 ALCOA DUTLOTHS PITTSOUGH, PA_15219

69 909116 ASACOMPA POSER CABLE CORPANY SAST STORTS HARROS, IS_46952

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59 900116 ALBION WIRE P.O. BOK 156 STATE ROAD & EAST ALBION,IN_46701

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HR. REECE PRAINER
ANCAST EMBESTRIAL CORPORATION
P.O. BDE 96
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55 900116 ARGLIN COMPANIES, INC. 1402 N. HAIN FORT NATHE, IN_46808

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71 900116
BPC MFG.
DIVISION OF BRISTOL CORP.
1755 N. OAK ROAD
PLYMOUTH, IN_46553-0697

75 900116
BLUFFTON POWER PLANT
514 E. WASHINGTON
BLUFFTON, IN_46714

78 900116 BREMAN CASTING 509 N SALTIMORE BREMAN, IN_46506

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DARYL LAMBERT
C AND R BARREL PLATING CORP.
COLUMBIA CITY, IS_46725

94 900116
CHEMICAL LEHMAN TANKLINES
5606 SOUTH 8.S. NIGHVAY 421
WESTVILLE, IN_46391

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CITY ESGISSES'S OFFICE WATER POLLUTION COSTROL
CITY HALL
FORT WATER, IS_46003

90 900116 DUMALD S. WORLPEL COLUMNIA (SEMEMAL, INC. P.O. SON 329 FORT WAYNE, IM., \$6001

93 900116 RICHARD D. TREPLE COOPER TIRE AND RUBBER COMPANY PINDLAY,OR_\$5040

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CUSTARD INSURANCE ADJUSTERS, INC.
P.O. BOX 10479

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CWARLES R. CAMPBELL
PLANT RUGINERR, BRODERICK CO.
500 LINCOLN STREET
DIVISION OF MARSCO CORPORATION
HUNCIE, IN_47302

92 900116
CARTER LUNGER COMPANY
5625 PENDELTON
ANDERSON, IN_46011

05 900116 CHEMSOLT, INC. 604 S. SCOTT P.O. BOE 1033 SOUTH BEED, IM_46624-1433

08 900116 CHI BADASH CAST, INC. P.O. BOX 668 WADASH, IV_46992

91 900116 COLUBLIGENERAL, INC. J. STCHARL 0*SARA, ESQ. P.O. 502 2263 SARBERY, SARBERY 6 HCHAGHY PORT SARBERY, IN_06001

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100 900116 JOHN CANAN VICE PRESIDENT, FNGINPFRING 74 900116
CHARLES V. CHAPPEE, PRESIDENT
BLUFFTON RUNBER CO., INC.
P.O. BOX 255
BLUFFTON, IN_46714

77 900116 LINDA J. SZEMBRUCH BORG-MARMER CORPORATION 200 SOUTH RICHIGAN AVENUE CMICAGO,IL_60604

90 900116 BUNGE CORP. OF INDIANA HIGHWAY 25 P.O. BOK 180 LOGAMSPORT, IN 45947-0188

93 900116 CEMPRE PROPERTIES, LTD. 19 g. LASALLE CHICAGO, IL_60603

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TINOTHY J. BLOOM
CITY OF COLUMBIA CITY, CITY HALL
CHANGERY STREET
COLUMBIA CITY, IN_46725

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92 900116
COPCORDIA THEOLOGICAL SEMINARY
6600 N. CLINTON
FOR WAYNE, IN_46825

75 900116
RAFMOND C. HARTER
DIVISION COUNSEL
CORPING GLASS WORKS
LEGAL DEPARTMENT
CORPING, NY 14831

96 900116 PLIARETH BOTTORPE AHLEMANN CTS CORPORATION FORT WATHE, IM_46852

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DAYCO CORPORATION
1200 W. MICHIGAN AVENUE
THREE RIVERS, HI_49093

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BUTLER, IM_46721

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DOUGLASS CONSTRUCTION CO., INC.
4777 REED ROAD
FORT WAYNE, IN_46015

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EDGERTON, ON_43517

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HILBS C. GRADERING
BARRETT, BARRETT & HCHAGHT
P.O. BOX 2263
RLECTRIC HOTORS & SPECIALTIES INC
FORT WAYNE, 19-46801

123 900116
ELMMURST BUS GARAGE
FORT WATHE SCHOOL DISTRICT
6006 ARDHORE AVENUE
FORT WATHE, IN_46889

P.O. BOX 1366 DALTON POUNDRIES, INC. WARSAW, IN_46560

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LARRY L. TUCKER
DAYTON-WALTHER CORPORATION
600 EAST HIGHLAND AVENUE
NUNCIE DIVISION
NUNCIE, IN_47303

106 900116 STEVEN L. ARTUSI, ESQ. CORPORATE COMUSEL DE PHY P.O. DOE 900 MARSAU, IN_46500

109 900116 POTCO COPPER AIR TOOLS 4030 STATE ROUTE 10 BICKSVILLE, DM_93526

112 900116 DUTER THSTRONERT 55 CARD WAKAROSA, IN_46360

115 900116 RODGET E. DOTOCH ASSOCIATE COMMSEL, E-SYSTEMS INC. P.O. DOT 660240 DALLAS, 71_75266

118 900116
RDOW RACKING DIVISION
SIMPSON IMPOSTRIES, INC.
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CLEMENT A. REVETTI
LEGAL COUNSEL
P.O. BOX 1000
DANA CORPORATION
TOLEBO, OR_47697

134 000116
DEKALO CENTRAL SCHOOL DISTRICT
P.D. BOE 507
AUBURN, FR_00705

107 - 00116 WM. A. DID ER S SONS 613 RIGH STREET P.O. BOX 10748 PORT WAYNE, [M_46853-0748

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BROWGLAS COMPONENTS CORPORATION

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P.O. BOE 146
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119 000116 ELCO INDUSTRIES, INC. P.O. BOE 60P LOGARSPORT, IN_46947

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153 900116
ITT AEROSPACE/OPTICAL DIVISION
DIVISION OF ITT CORP.
P.O. BOI 3700
FORT MATNE, IN_46801-3701

154 900116 INCO, INC. P.O. BOX 444 NUNTINGTON, IN_46750

156 900116
INDIANA DIE HOLDING
DIVISION OF NARWET INDUSTRIES INC
9100 FRONT STREET
FORT NAYNE, IN_06018-2209

157 900116 INDUSTRIAL PURL OILS, INC. 1702 S. PAIRFIELD AVENUE FORT WAYNE, IN_46804

159 900116
JAMESON CORP. OF INDIANA
209 W. ONIO STREET
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ERNDALLVILLE.IN_46755-2015

160 900116 JIN RELLT: BUICK, INC. 1819 S. CALHOUN PORT WAYNE, IN_46604

162 900116
JOSAN MANUFACTURING COMPANY
1500 EAST SECOND STREET
MICHIGAN, IN_06360

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JOT NAMOPACTURING COMPANY
301 GRANT STREET
PITTSBORGO, PA_15219

165 900116 KREAGER BROTRERS EXCAVATING RURAL ROUTE 1 CROMUELL, TM_46732

166 900116 EDORTS EQUIPMENT 6946 LILAC ROAD PLYNOUTH, IN_46563

168 900116 RERR GLASS RAMOPACTURING CORP. 524 BAST CROTER DOUGIRG, IN_07336 169 900116 LARDER CORP. RENER C. RANGENEY 11 S. RECTORAS ST. SUITE 1313 BARNES AND TROUMBURG INDIANAPOLIS, IN_46204

171 900116 (RA) SEME LOPSMIRE 401 W. FAIRFAX FORT WATHE, IN_46807 172 900116 LIME CITY MPG. CO., INC. 1470 ETMA AVENUE P.O. BOX 509 NUMTINGTON, IN_46750-3640

174 900116 LINCOLN HANNFACTURING COMPANY INC P.O. BOX 1229 FORT WAYNE, IN_46801 175 900116 LOBORLL-EMERT MFG. CO. 10050 17TH STREET ARGOS,[M_46501-9703

177 900116 LYDELL, INC., ELASTOMER PRODUCTS GROUP P.O. BOX 29 Grapher Stead 178 900116 ZAMEE, INC. 100 PROGRESS WAY W. AVILLA, IN_46710 152 900116
THOMAS L. ALDRICH
ASSISTANT GEMERAL COUNSEL
2700 SAWDERS ROAD
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PROSPECT MEIGHTS, IL_60070

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158 900116
INTERNATIONAL HARVESTER COMPANY
2701 COLISEM DOULEVARD
P.O. BOE 596
FORT WANNE, IN_46801

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JOHNSON PRODUCTS
2100 STRRLING AVENUE
ELKHART, IN_46516

164 900116
R. MART DISTRIBUTION CENTER
P.O. BOX 359
PORT WATHE, IN_46801

167 900116 RITCHEN QUIP, INC. UILLIAN L. SWEET, JR. P.O. BOE 2263 BARRETT, BARRETT S ACHAGNY FORT WAYNE, IN_46801

170 900116
RUPUS M. CRAIG, DIRECTOR OF LAW
MACHILLAN BLOEDAL, INC.
P.O. BOX 366
PINE HILL, AL_36769

173 900116 LIMESTONE PRODUCTS, INC. P.O. BOK 618 PORTLAND, IM_47371

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LOCK JOINT THE COMPANY, INC.
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THOMAS P. HAPPER, ESQ.
HARMAFOR COSSUSHER RESCTRIC CO.
P.O. BOX 14610
HORTH AMPRICAN PHILIPS COMPANY
EMORYILLF, TH_37914

103 900116 HARTIN (FIL N501 1274N ALSIP BLUE ISLAND, IL_60406

186 900116 MCCORD PEAT TRANSFEE CORP. 500 W. MARRISON STREET PLYNOUTH, IV_96563-1324

109 900116
HEARS SERVICE, INC.
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1 N. CAPITAL AVENUE
INDIANAPOLIS, IN_46240

192 900116 HISHAWAKA CITY SCHOOLS 1402 S. MAIN HISHAWAKA, IN_46544

195 900116 HIRRS SEPTIC SERVICE ROSTE 3 LIZONIER, IN_46767

198 900116 HATIONAL HEAT TREATING CORP. 1621 S. MONROE FORT WAYNE, IN_46883

201 900116 CDRSVA NAHWCW 2652 5265 WILLOWONNAM

204 900116 ONTARIO FORGE CORPORATION 101 900116
D.T. CAPLTON
RAGNAVOR GOV. 6 INDUSTRIAL
1313 PROPUCTION ROAD
ELECTRONICS COMPANY
PORT WATHE, IN_46608

184 900116
STEPREN T. DEMIS
ASSISTANT CORPORATE COUNSEL
21001 TAN BORN BOAD
HASOD INPUSTRIES, INC.
TATLOR, NT. 40100

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#COOURL ENTERPRISES, INC.
JAMES W. WOODSWALL, ESQ.
121 W. PARKLIN STREET, STE 400
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ELEMARY, IN_46516

190 900116 HERE HAFE, INC. 6529 HAPLEDOORS BRIVE FORT HARME, IN_46015

193 900116 HOMBART^D 910 63805R STREET LIGOUTER, IN_46767

196 900116 MAIS PODD RUBAL ROWTE 5 PORTLAND. IN_47371

199 900116 WORFOLK & WESTERN RAILYWAY CO. 8111 WELSON ROAD FORT WAYNE, IM_86803

202 900116 HORTHERN INDIANA PUBLIC SRVS. CO 5265 HOLHMAN AVENUE HANNOND, IN_46320

205 900116 ORTON-MCCULLOUGH CRANE SOUTH BEND, IN_46624

179 900116 ZOLLBER CORPORATION HILES C. GERBERDING P.O. BOX 2263 BARRETT, BARRETT & HCNAGNY PORT WAYNE, IN_46801

192 900116 MAPLENDOD SHELL SERVICE 6132 STELLNORN BOAD FORT WATHE, IN_46615

195 900116
NATERIALS NANDLING EQUIPMENT CORP
7433 US NIGHNAY 30 E.
PORT WATHE, IN_46803

198 900116
W.A. AILES
VICE PRESIDENT-TREASURER
909 W. LAPATETE STREET
HCGILL HANDPACTURING CO. INC.,
VALPARAISO, IN_46383

191 900116

METALLURGICAL PROCESSING, INC.
3715 R. WASHINGTON BOULEVARD
P.O. DOX 10042
PORT WATHE, IN_46854-0842

194 900116 MODRE BUSINESS FORMS WEST NILL ANGOLA, IN_46703

197 900116 R.H. RIVETHA, MANAGER ENVIRONMENTAL ENGINEERING B101 MEST HIGGINS ROAD WATIOMAL CAN CORP. CHICAGO, IN-60631

200 900116 NORTH AMERICAN VAN LINES, INC. 5001 U.S. HIGHWAY 30 W. FORT WAYNE, IN_46418

203 900116 0.F.C. MEDICAL SYSTEMS Onterto Fage Corporation
1200 MEST JACKSON STREET
P.O. BOX 2757
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207 900116 PMD CO. 4763 M. W.S. 24 E. NUMTINGTON, IN_46750-9617

210 900116
POORMAN'S MEATING AND AIR
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1417 NARTH
PORTY WATHE, IN_46002

213 900116
R.J. RIMA, SUPERVISOF
ENVIRORMENTAL APPAIRS
P.O. BOX 1346
PANNAMOLE EASTERN PIPFLIME CO.
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nDUICA H. PORRAW, SA. ATTORNET
R.R. DURLLET & SOUS
2223 HARTIN LOTOR ET PG DRIVE
CHICAGO, IL_60616

219 900116 REWCO OIL P.O. BOX 610 HISHAWAKA, 18_46544

222 900116 ROPPE RUBBER CORP. 101 INDUSTRIAL DRIVE AUGOLA, IN_46703-1045

225 900116 SEANCO 503 g. BROAD SOUTH WHITLEY,IN_4678⁷

228 900116 SMBLL CAR WASH 1001 W. 7TH AUBURN, IN_46706 Ortan-McCullongh Crane P.O. BOX 846 HISHAURKA, IN_86544

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P.O. BOY 943
PNILLIPS INDUSTRIES, INC.
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211 900116
POWER PLANT SERVICE, INC.
2010 LAKEVIEW ROAD
PORT WAYNE, IW_46808-3922

214 900116 ROWALD R. RICHRY PRECISION PLASTICS, INC. P.O. BOX 329 COLUMNIA CITY, IN_46725

217 900116 RACO, INC. RARVET SESSELL, INC. P.O. DOE 4002 RISHAWAKA, IN 46755

220 900116 REDSBERGER OFL 1604 REPEL SOUTH BERD, IN_46628

223 900116 STORE TRUCK RESTAL FORT WATER LEASTED F.O. SOE 419 FORT WATER, IN_46601

226 900116 SMAMMAN 6 CO., INC. 2531 BRENER DRIVE FORT WAYNE, [N_46803

229 900116 SMELLER GLOBE P.O. BOX 962 TOLEDO, ON_43697 age Medical Systems
501 ARJOHNE ROAD
WARSHULLE 46580

206 900115 PAR-TEE COMPANY, INC. STATE ROAD ONE SPENCERVILLE, IN_46746

209 900116
PLYNDUTH COMMUNITY SCHOOLS
701 EAST BERKELEY, STREET
PLYNDUTH, IM_46563

212 900116
PRAIRIE VIEW LANDFILL
P.O. BOX 128
WYATT, IN_46595

215 900116 PRINCO, INC. P.D. BOK 9782 FORT WATHE, IN_46899

216 900116 RECLAINER, INC. P.O. BOX 610 HISHAWARA,IN_46755

221 900116 ROCEWRLL INTERNATIONAL 1001 W. CULVER ROAD ROCE, IM_46534

224 900116
RYDER TRUCK RENTAL S LEASING
DISTRICT OFFICE
5225 HEM HAVEN AVENUE
FORT WATHE, IN_46803

227 999116 SHANE & HEATT HARAEHON P.O. BOK 125 SWAYSEE, EN_M6985 231 900116 SHOAPP PARE BAPTIST CHORCH 6651 ST. JOE ROAD FORT WATHELIN_06015

234 900116 SIBLET NACHINE & POUNDRY CORP. 206 EAST TOTT STREET P.O. BOX 49 SOUTH BRUD, IN_46624

237 900116 STANADYNE, INC. SIDNEY NAMOOSES, 88Q. 1 FIRST DATIONAL PLASA, STE. 5000 NINSTON AND STRAUM CHICAGO, IL_60603

240 900116 STOUTCO, IBC. 1 STOUTCO DELVE P.O. BOT 307 BRISTOL, IN_86507-0307

243 900116 SUPERIOR CO., INC. 1610 CALMOUN STREET PORT NATUR, IN_06000-2406

246 980116 SEPREME CORP. 16500 COUNT MOLD 20 P.O. 801 463 GOSHER.IE.46526-9354

249 900116 TTP, ISC. ROUTE 8 P.O. BOE 317 WARSAW, EM_46000

252 900116 U.S. AVIET CO. P.O. 801 340 1000 TERGINAL ROAD HILES, NI_49120

255 900116
UNITED STATES POST OFFICE
424 SOUTH NICHIGAN
SOUTH BEND, IN_46601

232 900116 STRPPRU'S JOHN DEERE SALES 6 SERVICE P.O. BOX 294 DLUPPTON, CH 46714

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253 900116 UNITOTAL PLASTICS CO., INC. 312 N. WILL STEET P.O. DOT 2000 WISHAWARA, IN_46544-1320

256 900116
##IVERSAL TOOL 6 STAMPING CO.
GRAPT VAN HORME
P.O. BOX 523
AURURN, IN_46706

230 900116 SMEREL'S ALL STAR DAIRY, INC. 1019 PLAINTLL ROAD UNITINGTON, IN_46750

233 900116 SHALL PARTS, INC. P.O. BON 23 LOGANSPORT, IN_46947

236 900116 SOUTH BEND LATHE 400 V. SAMPLE STREET SOUTH BEND, IN_46625

239 900116 SUPERIOR WASTE SYSTEMS C/O ROGER SEMMIER 3003 BUTTEMPTELO ROAD WASTE MANAGEMENT, INC. OAR BROOM, IL_60521

242 900116 SUN OIL COMPANY P.O. BOX 30 NUMPINGTON, IN_46750

245 900116 SUPERIOR WASTE SYSTEMS 54107 BUTTERBUT ROAD SOUTH BRUD, IN_46628

248 900116 STRDICATE SALES, INC. 801 W. MORGAN KORONO, EN_46901-2355

251 900116 USA 1 - ENTERPRISES, INC. 2501 LUU MISMAWAKA,IN_46544

254 900116 UNITED STATES GYPSUN CO. 3501 CANAL STREET EAST CHICAGO, [N_46312

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272 900116 KOLDK COMPORATION 6932 JETTESBURG PIKE FORT MATHE, IM_46604

ATTACHMENT III

PROPOSED PLAN

WAYNE RECLAMATION AND RECYCLING SITE COLUMBIA CITY, INDIANA

WAYNE RECLAMATION AND RECYCLING PROPOSED PLAN COLUMBIA CITY, INDIANA

INTRODUCTION

This Proposed Plan identifies the preferred option for cleaning up the contamination at the Wayne Reclamation and Recycling (WRR) site. In addition, the Plan includes summaries of other alternatives analyzed for this site. This document is issued by the U.S. Environmental Protection Agency (U.S. EPA), the lead agency for the site activities, and the Indiana Department of Environmental Management (IDEM), the support agency for this response action. U.S. EPA, in consultation with the IDEM, will select a final remedy for the site only after the public comment period has ended and the information submitted during this time has been reviewed and considered.

U.S. EPA is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). This document summaries information that can be found in greater detail in the Remedial Investigation (RI) and Feasibility Study (FS) reports and other documents contained in the administrative record file for this site. U.S. EPA and the State encourage the public to review these other documents in order to gain a more comprehensive understanding of the site and Superfund activities that have been conducted there. The administrative record file, which contains the information upon which the selection of the response action will be based, is available at the following locations:

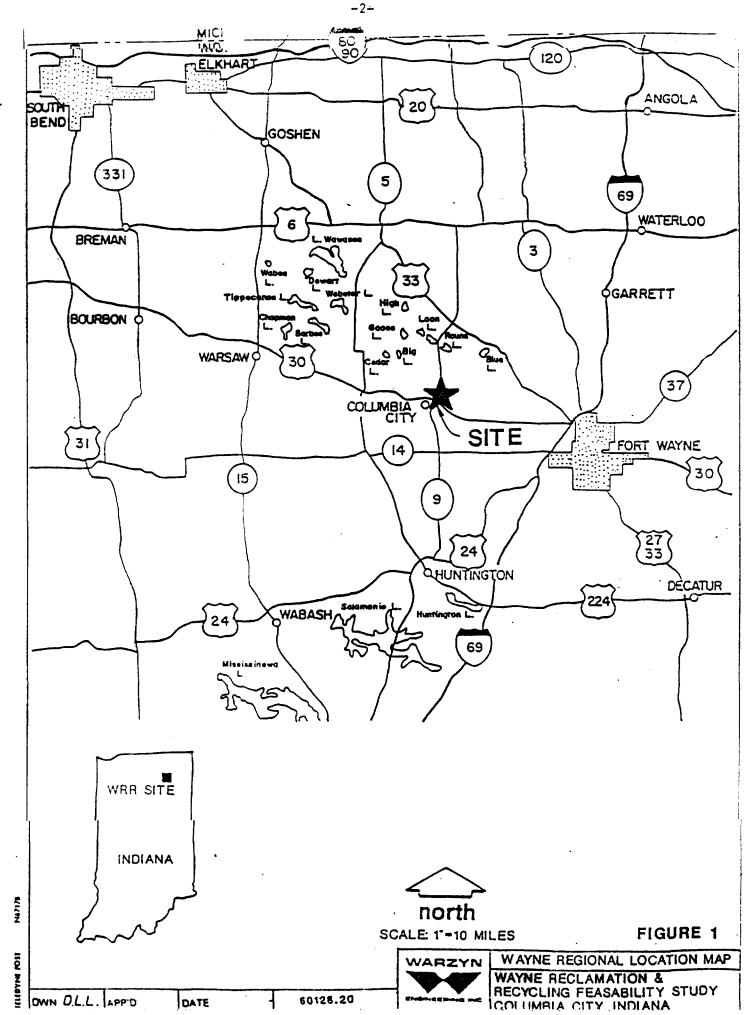
Peabody Library 203 N. Main Street Columbia City, Indiana 46725 Columbia City Hall 211 S. Chauncey Street Columbia City, Indiana 46725.

U.S. EPA, in consultation with the IDEM, may modify the preferred alternative or select another response action presented in the Plan and the RI/FS Reports based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives identified here.

SITE BACKGROUND

Site History

WRR is an approximately 30 acre site, located on the southeast edge of the Columbia City limits (Figure 1). It is bounded on the south and east by the Blue River and on the west and northwest by a cemetery and residential area. The site includes approximately 20 acres currently owned by WRR, 6 acres in the north which WRR sold to Holmes & Company in 1982, and 4 acres on the west owned by Columbia City.



D

In 1975, WRR purchased approximately 25 acres of land on the southeast edge of Columbia City, including a 13.6 acre portion that Columbia City owned since 1953. WRR and its division, Wayne Waste Oil, began operating an oil reclamation business at the site in 1975. In 1980, the Indiana State Board of Health (ISBH) began investigating the WRR site as a result of reports from a former WRR employee that hazardous wastes were being illegally disposed of at the site. ISBH determined that between February 1979 and May 1980, WRR filed hauler reports stating that it had disposed of 250,000 gallons of sludge at the Williams County landfill in Bryan, Ohio. However, the landfill had not received any waste shipments from WRR during that time.

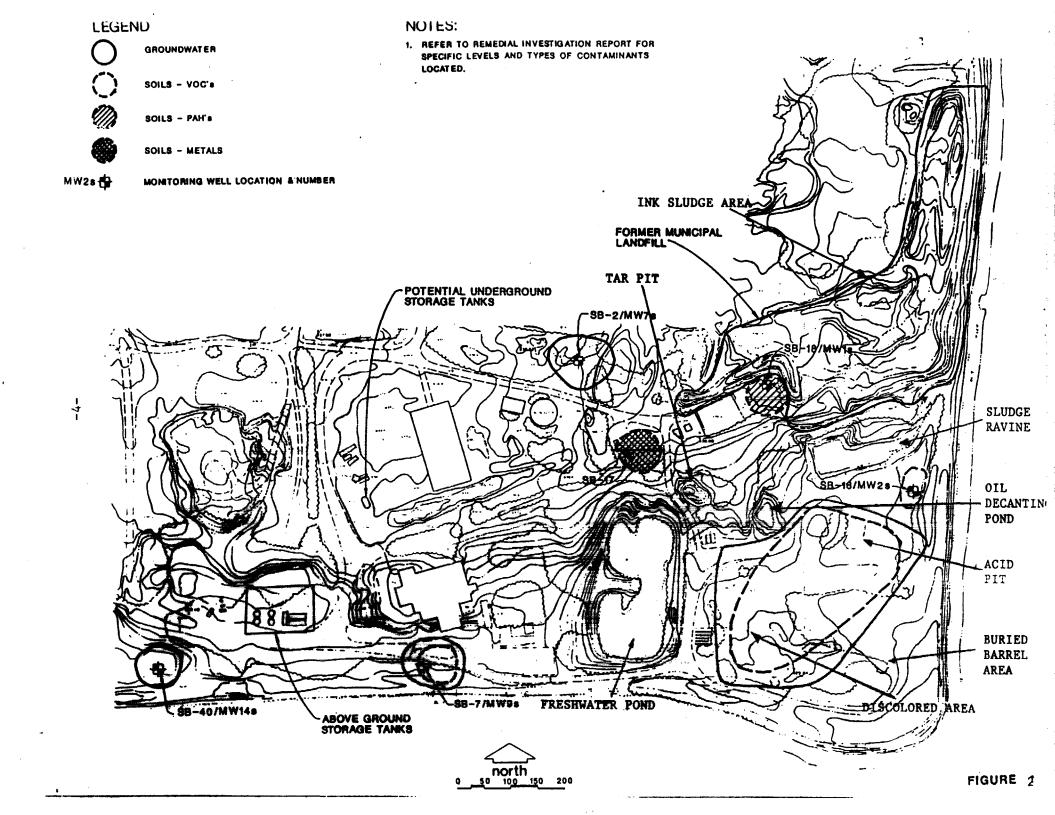
In 1982, WRR and one of its principals, Wayne Brockman, pleaded guilty to illegal "depositing of contaminants" and filing false hauler reports. They were required to pay a fine, to fund a risk assessment of the site, and to pay for cleanup. WRR did not perform the cleanup required under its guilty plea.

The site (Figure 2) can be divided into three major areas: the southeast portion designated as the lower floodplain; the northeast portion designated as an old City landfill area; and the central and west portion, known as the uplands. The lower floodplain includes the areas which have been identified as the "freshwater pond", "oil decanting pit", "tar pit", "sludge ravine", "discolored area", "buried barrel area" and "acid pit". The old City landfill which Columbia City operated from 1953 to 1970, is in the northeast part of the site. Also included in this area is the "ink sludge area". The upland area includes the now inactive WRR office buildings and numerous tanks.

In December, 1982, the WRR site was listed on the National Priorities List (NPL). On July 10, 1986, approximately 100 Potentially Responsible Parties (PRPs) entered into an Administrative Order by Consent with U.S. EPA to conduct a removal action at the site. Because the removal was not satisfactorily completed, a Unilateral Administrative Order was issued to a smaller group of PRPs on February 17, 1988, requiring them to complete a removal action.

On August 14, 1987, U.S. EPA entered into an Administrative Order by Consent with over 100 PRPs to conduct the RI/FS. The U.S. EPA and IDEM oversaw all facets of the investigations. The RI was conducted to determine the nature and extent of contamination and the FS evaluated the alternatives to prevent migration of the contaminants. Results of the RI, which was finalized in June, 1989, are as follows:

Surface soils in the area of the shooting range (SB-18) are contaminated with polynuclear aromatic hydrocarbons (PAHs).



- The highest levels of volatile organic soil contamination were detected in the southwest area of the site along the Blue River (SB-7/HW9 and SB-40/HW14S); in the northern portion of the site west of the old City Landfill; and the southeast corner of the site. The major contaminants are chlorinated ethenes and to a lesser extent, chlorinated ethanes, toluene and alkanes.
- o The majority of groundwater contamination is caused by chlorinated ethanes and occurs in the same general location as the volatile organic soil contamination.
- o Magnesium, cadmium, copper, zinc, and lead were detected at levels above the ranges considered to be common in "natural soils." In general, the elevated levels of these compounds coincided with the areas described above for the volatile organic compounds. However, one apparently isolated area of considerably high concentrations of these elements (particularly lead) was detected approximately midway between the "freshwater pond" and the northern boundary of the site (\$B-17/\$B-17\$A). In addition, investigations in 1987, by the Technical Assistance Team (TAT) and the Environmental Response Team (ERT) found elevated levels of lead in the contents of four vertical and three horizontal tanks, located just west of the WRR office, and in the surrounding soils.
- concentrations of inorganic parameters in surface water and sediments from the Blue River adjacent to the site were not significantly above those upstream from the site boundary, with the possible exception of copper and zinc in sediments. A slight increase in cyanide concentrations was observed adjacent to the site as compared to upstream concentrations. Concentrations of inorganic parameters (particularly cyanide) in on-site surface waters were elevated in the wetland north of the site, "sludge ravine", and "oil decanting pit." Volatile organic compounds in on-site sediments were elevated in the three surface water locations previously mentioned, as well as in the "freshwater pond."
- o Although this was not discussed in the RI, the old City Landfill lacks appropriate cover to ensure compliance with RCRA Subtitle D regulations.

Scope and Role of the Response Action

The PRPs, under the direction of the U.S. EPA have already initiated two removal response actions at this site. Removal activities under the 1986 Administrative Order by Consent included excavation and disposal of contaminated soil in the "oil decanting pit", "tar pit" and "sludge ravine"; removal and disposal of the contents of 215 55-gallon drums and soil from the

"buried barrel area" and backfill. Backfilling remains to be done in the "oil decanting pit", "tar pit" and "sludge ravine". Removal activities under the 1988 Unilateral Administrative Order included excavation and disposal of contaminated soil from the "discolored area", "acid pit", "ink sludge area" and "sludge ravine"; removal and disposal of an additional 125 drums; removal and disposal of the contents of 23 horizontal tanks; fencing of the "oil decanting pit", "sludge ravine", and "discolored area"; and backfilling the "acid pit" and "ink sludge area" with off-site borrow.

This Proposed Plan addresses contaminated soil and groundwater in the lower floodplain and upland areas of the site; RCRA Subtitle D closure requirements for the old Columbia City landfill; and empty/clean/removal of the remaining tanks and debris which pose a threat to human health and the environment. These areas were determined to be a principal threat at the site because of the potential threat of direct contact with the soils and the soil's impact on the groundwater. The contaminated groundwater is a principal threat at the site because of the potential for direct ingestion of contaminants through municipal and private drinking water wells. This is the third and final response action for this site.

Summary of Site Risks

During the RI, an analysis was conducted to estimate the health or environmental problems that could result if the contamination at the WRR site was not cleaned up. This analysis is commonly referred to as a baseline Endangerment Assessment (Chapter 6 of the RI Report). In conducting this assessment, the focus was on the health effects that could result from direct exposure to the contaminants as a result of the soil coming into contact with the skin, or from direct ingestion of the soil. The Endangerment Assessment also focused on the health effects that could result from ingestion, inhalation, or direct contact with the skin of contaminated groundwater from a municipal or drinking water well.

Groundwater

The major contaminants of concern in the groundwater were Trichloroethylene (TCE) and vinyl chloride. TCE and vinyl chloride are volatile organic compounds that are known to cause cancer in laboratory animals and are therefore classified as carcinogens. TCE is a highly mobile contaminants that typically migrates through the soil into the groundwater.

The average concentrations of TCE and vinyl chloride found in the groundwater beneath the WRR site resulted in an excess lifetime cancer risk of 2 x 10^{-4} . This means that if no cleanup action is taken by U.S. EPA, two additional people per ten thousand have a chance of contracting cancer as a result of the exposure to

groundwater contaminated with TCE and vinyl chloride.

Soil

The major contaminants of concern in the soils were polynuclear aromatic hydrocarbons (PAHs) and Polychlorinated biphenyls (PCBs). PAHs and PCBs are also classified as carcinogens. PAHs tend to be relatively immobile contaminants that will typically remain in the soil for long periods of time.

Sampling of the on-site soil found that average concentrations of PAHs resulted in an excess lifetime cancer risk of 3 \times 10⁻². This means that if no cleanup action is taken by U.S. EPA, three additional people per one hundred have a chance of contracting cancer as a result of the exposure to the PAH-contaminated soil.

These estimates were developed by taking into account various conservative assumptions about the likelihood of a person being exposed to the soil and groundwater and the toxicity of the contaminants.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or one of the other active measures considered, may present an imminent and substantial endangerment to public health, welfare, or the environment.

SUMMARY OF ALTERNATIVES

Based on the findings in the RI report, the following remedial action objectives were established for the WRR site to ensure protection of human health and the environment:

Groundwater

- o Minimize potential future risk to public health from consumption of contaminated groundwater.
- o Control migration of contaminated groundwater to the Blue River water and sediment.
- o Reduce migration of subsurface soil contaminants to the groundwater

Contaminated Soil

- o Minimize risk to public health and environment from the direct contact with PCB and PAH contaminated surface soil.
- o Reduce potential for erosion and transport of contaminated surface and subsurface soil to the Blue River.

Municipal Landfill

o Ensure adequate cover is present to prevent erosion and exposure of waste resulting in direct contact or washout to the river.

Surface and Subsurface Tanks and Contents

o Eliminate potential migration of tank contents to surface and subsurface soil and groundwater.

Common Elements

There are seven remedial action alternatives which have been developed to address the contamination at the WRR site. Except for the "No Action" alternative, all of the alternatives now being considered for the site would include a number of common components. Alternatives 2 through 7 include removal and/or treatment of the tank contents and capping of the municipal landfill in accordance with RCRA Subtitle D sanitary landfill closure requirements. Soil and groundwater in the vicinity of the tanks may require additional investigation to delineate the extent of contamination due to spills or leaks associated with the tanks. It is assumed that additional soil or groundwater contamination could be addressed in a similar manner used in other areas of the site.

A large amount of debris is scattered throughout the site. These materials should be evaluated and those determined to be solid waste can be consolidated and placed under the municipal landfill cap. Those materials determined to be contaminated with hazardous waste would need to be cleaned or disposed in accordance with RCRA.

Each alternative also includes groundwater extraction and treatment to health-based levels and MCLs. Long-term groundwater monitoring in compliance with requirements of RCRA Subpart F, 40 CFR Section 264.100 will be conducted to gauge the effectiveness of the selected remedy. In addition, erosion control provisions and deed restrictions are required. It should also be noted that the wastes at the WRR site were found to be sufficiently similar to RCRA-listed waste or RCRA-characteristic wastes to make RCRA relevant and appropriate.

Lead-contaminated soil was found in the vicinity of SB-17 and SB-17A. Although this contamination appears to be localized, the extent of remediation of this area will be determined based on additional sampling during the remedial design. Remediation of the lead-contaminated soil will be achieved by either soil washing or immobilization technologies.

A more detailed discussion of the remedial action alternatives is presented below. Costs, including annual operation and maintenance (O&M), for each alternative are also provided. All costs and implementation times are estimated.

Alternative 1: NO ACTION

Capital Cost: \$0
Annual O&M Cost: \$0
Present Worth: \$0
Time to Implement: None

The Superfund program requires that the "no action" alternative be evaluated at every site to establish a baseline for comparison. Under this alternative, U.S. EPA would taken no further action at the site to prevent exposure to the soil and groundwater contamination.

Alternative 2: GROUNDWATER EXTRACTION AND AIR STRIPPING/ COVERING PAH-CONTAMINATED SOILS/ CAPPING VOC-CONTAMINATED SOILS/ EROSIGN CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,329,630
Annual O&M Cost: \$ 228,500
Present Worth: \$5,483,700
Time to Implement: 30 years

Given the presence of the municipal well field immediately north of the site, vertical hydraulic gradients are downward from the upper to lower aquifers when the municipal well is being used. Therefore, the groundwater extraction system would be designed to lower the water table approximately 3.5 feet so that groundwater gradients are upward even when the municipal wells are pumping. The extraction wells in the southeast area of the site would be located within a slurry wall in order to allow for lower extraction rates and to facilitate lowering of the groundwater table. Additional groundwater extraction wells would also be placed through the site in order to intercept all contaminated groundwater. Treated groundwater would be discharged to the Blue River. Discharge limits would be established in accordance with IDEM's NPDES program.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. VOC-contaminated soil will be capped in accordance with RCRA Subtitle C closure requirements to prevent the incidence of dermal contact and reduce contaminant migration to the groundwater via infiltration.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 1: GROUMBWATER EXTRACTION AND AIR STRIPPING/ SOIL FLUSHING WITH THRATED GROUNDWATER/ COVERING PAH-CONTAMINATED SOILS/ ENGSIGN CONTENDS/ DEED RESTRICTIONS/ MOMITCRING/ CAPPING HUNICIPAL LAMBFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,248,230
Annual O&M Cost: \$236,700
Present Worth: \$5,110,848
Time to Implement: 15 years

The groundwater extraction and treatment system would be identical to the system described for Alternative 2. However, to reduce the time that the system will need to operate, the treated effluent will be flushed through the areas of the site with VOC-contaminated soils. A treatability study will be required to determine the process effectiveness and necessity for adding surfactants to the flushing fluid for aid in contaminant removal. Contaminants are recovered by the groundwater extraction system and treated. The soil flushing has the effect of accelerating the natural process of soil flushing that would occur through rainfall infiltration. It is estimated that the flushing system would operate for a period of 15 years.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 4: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,306,875 Annual O&M Cost: \$ 291,000 Present Worth: \$5,582,499 Time to Implement: 15 years

To reduce the time required to operate the groundwater extraction and treatment system presented in Alternative 2, a soil vapor extraction (SVE) system would be used to remove the VOC contamination from the soil. The vapor extraction wells would be placed in the areas of the site with VOC-contaminated soils. The area surrounding the vapor extraction wells would be covered with approximately three feet of fill to increase the efficiency of the system by reducing the volume of air being pulled from above the ground surface. The air emissions will be treated to health-based levels. The SVE and groundwater extraction systems will operate in conjunction for approximately 15 years to meet the clean-up criteria.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 5: GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND BIOLOGICAL TREATMENT OF VOC-CONTAMINATED SOIL/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$7,988,170
Annual O&M Cost: \$ 279,000
Present Worth: \$9,927,114
Time to Implement: 15 years

To reduce the operating time for the groundwater extraction and treatment system presented in Alternative 2, approximately 30,000 cubic yards of VOC-contaminated soils would be excavated and biologically treated on-site. Microorganisms, nutrients, and oxygen would be supplied to the contaminated soils to promote transformation and aerobic biological degradation of the VOC contaminants. The area available to construct the treatment facility is not large enough to accommodate all of the contaminated soil at one time. Therefore, the excavation, treatment and backfilling operations would need to be staged. It is estimated that soil treatment would take two to four years.

Since this alternative involves the excavation and placement of waste, the RCRA Land Disposal Restrictions (LDR) would be invoked. Therefore, the cost estimate assumes a minimum technology disposal unit would be constructed prior to redisposal of the excavated and treated soil.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 6: GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND ON-SITE INCINERATION OF VOC- AND PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$ 9,805,845
Annual O&M Cost: \$ 228,500
Present Worth: \$11,322,222
Time to Implement: 10 years

To minimize the operating time of the groundwater extraction and treatment system presented in Alternative 2, the VOC- and PAH-

contaminated soils would be excavated and incinerated on-site. Approximately 30,000 cubic yards of contaminated soil would be incinerated on-site using a mobile infrared unit. Based on an average process rate of 14,000 lb/hr, the incineration process would be completed in approximately nine to twelve months. It is estimated that the groundwater extraction system would operate for approximately ten years.

For costing purposes, it is assumed that the incinerator ash would not be a RCRA hazardous waste and could be backfilled on-site. Confirmatory sampling would be required prior to disposal. Waste sludge from the incinerator air scrubbers would, however, be considered hazardous and would thus require disposal at an approved RCRA facility.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 7: GROUNDWATER EXTRACTION AND DISCHARGE TO THE POTW/COVERING PAH-CONTAMINATED SOILS/CAPPING VOC-CONTAMINATED SOILS/EROSION CONTROLS/DEED RESTRICTIONS/MONITORING/CAPPING MUNICIPAL LANDFILL/REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,571,980
Annual O&M Cost: \$ 298,500
Present Worth: \$6,385,960
Time to Implement: 30 years

This alternative is the same as Alternative 2, except that the extracted groundwater would be discharged to the POTW instead of air stripping and discharge to the Blue River. Consideration of this alternative would is based on the assumption that the Columbia City POTW is willing and able to accept the WRR site effluent. Currently the POTW does not have a pretreatment program with IDEM. The Columbia City POTW is scheduled for a capacity expansion in October 1990.

EVALUATION OF ALTERNATIVES

The preferred alternative for cleaning up the WRR site is Alternative 4 -- GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS. In addition, additional investigation will be conducted in the now inactive tank area and the lead-contaminated soil area (at SB-17 and SB-17A) to determine the extent of remediation. Based on current information, this alternative would appear to provide the best balance of trade-offs among the alternatives with respect to U.S. EPA's nine evaluation criteria. This section discusses the performance of the preferred alternative

against the nine criteria, noting how it compares to the other options under consideration. A glossary of the evaluation criteria is contained in Table 1.

Analysis

Overall Protection. All of the alternatives, with the exception of the "no action" alternative, would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through treatment or engineering controls. The preferred alternative would treat the volatile organic contaminants in the soil and groundwater, cover the PAH-contaminated soil, and cap the municipal landfill to reduce the risks associated with direct contact and ingestion of contaminated soils and/or groundwater.

Because the "no action" alternative is not protective of human health and the environment, it is not considered further in this analysis as an option for this site.

Compliance with ARARs. All alternatives would meet their respective applicable or relevant and appropriate requirements of Federal and State environmental laws. Since the preferred alternative would not involve the excavation and placement of waste, LDR would not be an ARAR. However, all options would involve the relevant and appropriate RCRA requirements.

Discharge of the treated groundwater to the Blue River would meet the State's NPDES discharge limits. No waiver from ARARS is necessary to implement any of the active cleanup options. Soil clean-up levels will be established to ensure that contaminant leaching into the groundwater will not exceed health-based levels or MCLs.

Long-term effectiveness and permanence. The preferred alternative would reduce the inherent hazards posed by the VOC-contaminated soil and groundwater through treatment. SVE would be an effective method to reduce contaminant levels in soils because the primary contaminants are VOCs. In addition, the soil cover over the PAH- and VOC-contaminated soils would eliminate the direct contact threat associated with these areas. Removal of the tank contents would eliminate the potential for additional contamination of the surrounding soil and groundwater due to leaks or spills from the tanks.

Alternative 3 would also be effective in reducing site risks. However, potential complications with soil flushing are the controls required to lower the water table to induce upward gradients from the lower aquifer, while at the same time flush soils above the water table. In addition, the heterogeneous nature of the soils in the southeast area of the site may cause the drainage gallery to backup and discharge to the surface.

TABLE 1

GLOSSARY OF THE NINE CRITERIA

Community Acceptance will be assessed in the Record of Decision following a review of the public comments received on the RI/FS report and the Proposed Plan.

Compliance with ARARs

addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other environmental statutes and/or requires uses of a waiver.

Cost

includes capital and operation and maintenance costs.

Implementability

is the technical and administrative feasibility of a remedy, including the availability of goods and services needed to implement the chosen solution.

Long-term Effectiveness and Permanence refers to the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.

Overall
Protection of
Human Health and
the Environment

addresses whether or not a remedy provides adequate protection and describes how risks are eliminated, reduced or controlled through treatment, engineering controls, or institutional controls.

Reduction of Toxicity, Mobility, and Volume is the anticipated performance of the treatment technologies a remedy may employ.

Short-term
Effectiveness

involves the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

State Acceptance indicates whether, based on its review of the RI/FS, Proposed Plan, and public comments, the State agency concurs, opposes, or has no comment on the preferred alternative.

Alternatives 5 and 6 would effectively reduce site risks through treatment; however, land disposal of the treated material or ash would require long-term O&M.

Alternatives 2 and 7 would eliminate the direct contact threat; however, the inherent hazards of the waste will remain. The municipal landfill cap and groundwater monitoring system will require long-term O&M for all alternatives. Alternatives 5 and 6 are the only alternatives that would actively treat the PAH-contaminated soil, for all other alternatives these soils would be consolidated under the municipal landfill cap.

Reduction of toxicity, mobility, or volume of the contaminants through treatment. Only four of the alternatives would treat the principal threat of VOC-contaminated soil to reduce toxicity, mobility, or volume. The preferred alternative and alternative 3 would involve treatment of the VOC-contaminated soil via SVE or soil flushing in conjunction with groundwater extraction and treatment.

Alternatives 5 and 6 would involve biological treatment or incineration that would permanently destroy the VOC and PAH contaminants. The treated soil or contaminated ash would; however, be disposed of in a RCRA landfill.

Alternatives 2 and 7 achieve no reduction in toxicity, mobility, or volume for the VOC-contaminated soils.

It should be noted that although the cap over the municipal landfill and PAH-contaminated soil does not afford a reduction in toxicity, mobility, or volume, it would significantly reduce infiltration and the production of leachate that could migrate off-site.

Short-term effectiveness. The preferred alternative and Alternative 3 would require approximately 15 years to achieve the groundwater clean-up levels. Although Alternatives 5 and 6 would achieve groundwater clean-up levels quicker, both of these alternatives require excavation which would pose some short-term risks of exposure to VOCs during the excavation process. In addition, rainfall infiltration will be immediate during the construction period. This could increase the migration of contaminants in the groundwater. Groundwater clean-up levels would not be achieved for 30 years for Alternatives 2 and 7.

Implementability. The individual technologies described for each of the alternatives are conventional and well demonstrated. However, there is some concern over the technical feasibility of Alternative 3 given the heterogeneous nature of the soils. Conversely, the preferred alternative, which involves SVE has been found to be feasible for a variety of soil conditions.

No unusual difficulties in the placement of the soil cover and municipal landfill cap are anticipated. However, given the close proximity of the PAH-contaminated soil to the municipal landfill the feasibility of constructing two caps is questionable. It may be more appropriate to just incorporate the PAH-contaminated soil under the municipal landfill cap.

Implementation of Alternative 7 would require the consent of Columbia City for use of its POTW.

Cost. The present-worth cost of the preferred alternative is \$5,582,500. The lowest-cost alternative is Alternative 3 at \$5,110,800. The highest-cost alternative is Alternative 6 at \$11,322,200. Alternatives 2, 5 and 7 have present-worth costs of \$5,483,700, \$9,927,100, and \$6,386,000, respectively.

State acceptance. The State of Indiana Department of Environmental Management supports the preferred alternative.

Community acceptance. Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision for the site.

Summary of the Preferred Alternative

In summary, Alternative 4 would achieve substantial risk reduction through treatment of the principal threat remaining at the site (i.e., the VOC-contaminated soil, groundwater, and tank contents) and by providing safe management of other material that will remain at the site. Given its effectiveness and implementability, Alternative 4 achieves this risk reduction in a comparable or smaller timeframe and cost than the other treatment options. Therefore, the preferred alternative is believed to provide the best balance of trade-offs among alternatives with respect to the evaluation criteria. Based on the information available at this time, U.S. EPA believes the preferred alternative would be protective of human health and the environment, would comply with ARARs, would be cost effective. and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Because it would treat the VOC-contaminated soil and groundwater, the remedy also would meet the statutory preference for the use of a remedy that involves treatment as a principal element.

THE COMMUNITY'S ROLE IN THE SELECTION PROCESS

U.S. EPA solicits input from the community on the cleanup methods proposed for each Superfund response action. U.S. EPA has set a public comment period from January 22, 1990 through February 21, 1990 to encourage public participation in the selection process. The comment period includes a public meeting at which U.S. EPA

and IDEM will present the FS report and the Proposed Plan, answer questions, and receive both oral and written comments.

The public meeting is scheduled for Wednesday, February 7, 1990 at 7:00 p.m. and will be held at:

Council Room, City Hall 112 South Chauncey Columbia City, Indiana

Comments will be summarized and responses provided in the Responsiveness Summary section of the Record of Decision (ROD). The ROD is the document that presents U.S. EPA's final selection for cleanup. The public can send written comments to or obtain further information from:

Tinka G. Hyde
Remedial Project Manager
U.S. EPA - 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604
(312) 886-9296

Toll free (800) 621-8431 between 9:00 a.m. and 4:30 p.m. Central Time

U.S. EPA and IDEM are soliciting public comments about the most acceptable way to clean up the Wayne Reclamation and Recycling site. The Proposed Plan and the RI/FS Reports have been placed in the Information Repositories and Administrative Record for the site. The Administrative Record includes all documents such as work plans, data analyses, public comments, transcripts and other relevant material used in developing the remedial alternatives for the Wayne Reclamation and Recycling site. These documents are available for public review and copying at the following locations:

City Hall
112 South Chauncey
Columbia City, IN

Peabody Library 203 North Main Columbia City, IN.

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